

IN THE CIRCUIT COURT OF MARYLAND FOR CHARLES COUNTY**SONIA SHORT**

1424 S Street SE

Washington, DC 20002

Plaintiff

v.

CIVIL ACTION NO.:**WALMART CLAIMS SERVICES, INC.**

702 SW Eighth Street

Bentonville, AR 72716

Serve: **THE CORPORATION TRUST, INC.**

2405 York Road Suite 201

Lutherville Timonium, MD 21093

Defendant

C-08-CV-24-000488

COMPLAINT

Plaintiff, Sonia Short, by her attorney, Erick P. Gracia, hereby files suit against the Defendant, Walmart Claims Services, Inc., and for reasons, states as follows:

INTRODUCTION

1. That the Plaintiff, Sonia Short, is a resident of the District of Columbia.
2. That the Defendant, Walmart Claims Services, Inc., hereinafter referred to as "Defendant," is a corporation doing business in Maryland, who owned and/or managed the store known as Sam's Club, store#6655, located at 2365 Crain Highway, Waldorf, Maryland 20601.
3. On or about July 2, 2021, Plaintiff went to the Defendant's store to shop, while she was picking up a case of water her foot was caught in the crates that the cases of water were stacked on top of which caused the Plaintiff to fall.

4. Defendant knew, or, in the exercise of reasonable care should have known, of the condition, or Defendant created the condition either through the acts of its employees, in its negligent maintenance of equipment, or in its negligent method of operation, and Defendant should have corrected the condition or warned Plaintiff of its existence.

5. As a result of this negligence, the Plaintiff did suffer great pain and injury, loss of income, mental anguish, and has incurred and in the future will incur medical expenses.

COUNT 1
(Negligence)

6. Plaintiff, Sonia Short, realleges the facts and allegations set forth in the Introduction, and further states as follows:

7. The aforesaid incident occurred as a result of and was proximately caused by the careless, negligent, grossly careless, and reckless conduct of the Defendant, Walmart Claims Services, Inc., which consisted inter alia of the following:

- a. Failing to properly supervise the common areas in question so as to furnish to the Plaintiff, Sonia Short, a safe shopping area, free from hazards which were recognized or should have been recognized by Defendant, Walmart Claims Services, Inc., as causing or likely to cause the serious physical harm to the Plaintiff, Sonia Short and others;
- b. Failing to maintain the area in a safe condition to ensure that the Plaintiff would not be caused to fall as a result of the cases of water stacked on crates which were known and should have been known to the Defendant;
- c. Failing to maintain the store owned by the Defendant in good and safe condition for the Plaintiff and others;

- d. Otherwise failing to exercise the degree of care required under the circumstances; and
- e. Otherwise being negligent.

8. As a result of this negligence, the Plaintiff did suffer great pain and injury, loss of income, mental anguish, and has incurred and in the future will incur medical expense.

WHEREFORE, Plaintiff, Sonia Short, demands judgment against said Defendant in the amount in excess of one hundred thousand dollars (\$100,000.00).

Respectfully submitted,

Erick Gracia

/s/

Erick P. Gracia, Esquire
Gracia & Mintz, LLC.
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DEMAND FOR JURY TRIAL

Plaintiff demands Trial by Jury on all issues herein.

Erick Gracia

/s/

Erick P. Gracia